

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

THE CHAMBERLAIN GROUP LLC  
Plaintiff,

v.

OVERHEAD DOOR CORPORATION and  
GMI HOLDINGS INC.,

Defendants.

Case No. 2:21-cv-0084-JRG

**JURY TRIAL DEMANDED**

**JOINT PROPOSED DOCKET CONTROL ORDER**

Plaintiff The Chamberlain Group, LLC (“Chamberlain”) and Defendants Overhead Door Corporation and GMI Holdings Inc. (“Overhead Door”) (collectively, the “Parties”), in accordance with the Court’s Order (Dkt. 386), jointly move the Court to enter the Docket Control Order offered below, which is agreed to by the Parties.

<b>Event</b>	<b>Date</b>
Deadline to File Federal Rule of Civil Procedure 50(b) Renewed Judgments as a Matter of Law	No fewer than 28 days following the entry of judgment on all claims <sup>1</sup>
*Jury Selection – 9:00 a.m. in Marshall, Texas.	Monday, September 12, 2022
*If a juror questionnaire is to be used, an editable (in Microsoft Word format) questionnaire shall be jointly submitted to the Deputy Clerk in Charge by this date. <sup>1</sup>	Monday, August 29, 2022

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<sup>1</sup> For clarity, this deadline applies to all asserted claims and issues, including those relating to the ’416 patent.

<b>Event</b>	<b>Date</b>
*Pretrial Conference – 9:00 a.m. in Marshall, Texas before Judge Rodney Gilstrap	Monday, August 29, 2022
*Notify Court of Agreements Reached During Meet and Confer The parties are ordered to meet and confer on any outstanding objections or Motions <i>in Limine</i> . The parties shall advise the Court of any agreements reached no later than 1:00 p.m. three (3) business days before the pretrial conference.	Wednesday, August 24, 2022
*File Joint Pretrial Order, Joint Proposed Jury Instructions, Joint Proposed Verdict Form, Responses to Motions <i>in Limine</i> , Updated Exhibit Lists, Updated Witness Lists, and Updated Deposition Designations	Monday, August 22, 2022
<p>*File Notice of Request for Daily Transcript or Real Time Reporting.</p> <p>If a daily transcript or real time reporting of court proceedings is requested for trial, the party or parties making said request shall file a notice with the Court and e-mail the Court Reporter, Shelly Holmes, at <a href="mailto:shelly_holmes@txed.uscourts.gov">shelly_holmes@txed.uscourts.gov</a>.</p>	Monday, August 8, 2022
<p>File Motions <i>in Limine</i></p> <p>The parties shall limit their Motions <i>in Limine</i> to issues that if improperly introduced at trial would be so prejudicial that the Court could not alleviate the prejudice by giving appropriate instructions to the jury.</p>	Monday, August 8, 2022

<b>Event</b>	<b>Date</b>
Serve Objections Pretrial Disclosures	Monday, August 8, 2022
Serve Rebuttal Pretrial Disclosures	Wednesday, August 3, 2022
Serve Pretrial Disclosures (Witness List, Deposition Designations, and Exhibit List)	Monday, August 1, 2022
<p>*Response to Dispositive Motions and Motions to Strike (including Daubert Motions).</p> <p>Responses to dispositive motions that were filed prior to the dispositive motion deadline, including Daubert Motions, shall be due in accordance with Local Rule CV-7(e), not to exceed the deadline as set forth in this Docket Control Order.2 Motions for Summary Judgment shall comply with Local Rule CV-56.</p>	Wednesday, July 27, 2022
<p>*File Motions to Strike Expert Testimony (including Daubert Motions)</p> <p>No motion to strike expert testimony (including a Daubert motion) may be filed after this date without leave of the Court.</p>	Wednesday, July 13, 2022

<b>Event</b>	<b>Date</b>
<p>*File Dispositive Motions</p> <p>No dispositive motion may be filed after this date without leave of the Court.</p> <p>Motions shall comply with Local Rule CV-56 and Local Rule CV-7.</p> <p>Motions to extend page limits will only be granted in exceptional circumstances. Exceptional circumstances require more than agreement among the parties.</p>	Wednesday, July 13, 2022
Deadline to Complete Expert Discovery	Friday, July 8, 2022
Serve Disclosures for Rebuttal Expert Witnesses	Monday, June 27, 2022
Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof	Wednesday, June 15, 2022

<b>Event</b>	<b>Date</b>
Deadline to Complete Fact Discovery and File Motions to Compel Discovery	Monday, June 13, 2022
Deadline to Substantially Complete Document Production	Friday, April 29, 2022
Deadline to Substantially Complete Source Code Production Relating to Combo Board Products	Monday, April 18, 2022

Date: April 11, 2022

Respectfully submitted,  
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**COUNSEL FOR PLAINTIFF THE  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all counsel of record via email on this 11th day of April, 2022.

*/s/Benjamin C. Elacqua* \_\_\_\_\_  
Benjamin C. Elacqua

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the parties met and conferred on April 6, 2022 and that the foregoing motion is joined in its entirety by both parties.

*/s/Benjamin C. Elacqua* \_\_\_\_\_  
Benjamin C. Elacqua